

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PAUL PHILLIPS, et. al.,

Plaintiffs,

-against-

THE CITY OF NEW YORK, et. al.,

Defendants.

**NOTICE OF JOINDER OF  
RENAN BEAUCHARD IN  
MOTIONS TO DISMISS OF  
OTHER DEFENDANTS AT  
DOCKET 141**

**21 CV 8149 (ALC)(SLC)**

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**PLEASE TAKE NOTICE** that that upon the Declaration of Mark D. Zuckerman, dated December 22, 2023, and the exhibits annexed thereto (Docket 142); defendants' Memorandum of Law, dated December 22, 2023 (Docket 143); and upon all prior pleadings and proceedings had herein, defendant Renan Bouchard, hereby joins in the motions to dismiss of the other defendants herein at Docket 141, and will move this Court, before the Hon. Andrew L. Carter, Jr., United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl St., New York, New York 10007, at a date and time to be determined, pursuant to Rule 12(b)(1), Fed. R. Civ. P. for the dismissal for lack of subject matter jurisdiction; pursuant to Rule 12(b)(6), Fed. R. Civ. P. for the dismissal for failure to state a claim, of all of plaintiffs' claims with prejudice; and pursuant to Rule 12(f), Fed. R. Civ. P. for the striking of plaintiffs' class allegations; and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that, plaintiffs are to serve their opposition papers on or before a date and time to be determined by the Court; and

**PLEASE TAKE FURTHER NOTICE** that the moving defendant is to serve his reply papers on or before a date and time to be determined by the Court.

Dated: New York, New York  
April 11, 2024

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By: /s/ Mark D. Zuckerman  
Mark D. Zuckerman  
Senior Counsel